

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

Pacific Capro Industries d/b/a Capro
Industries,

Plaintiff,

vs.

Global Advantage Distribution Warehouse,
LLC d/b/a Global Advantage Distribution
Warehouse, Inc., Global Advantage
Distribution, Inc., Global Advantage Holding,
LLC, Matthew J. Crawley, Kevin C. Snow,
and Eric C. Gibson,

Defendants.

04:08-CV-4155-RBH

**NOTICE OF MOTION AND MOTION
FOR RELIEF, PURSUANT TO RULE
60(a), Fed. R. Civ. P.**

Plaintiff Pacific Capro Industries d/b/a Capro Industries (“Capro”), by and through the undersigned counsel, will move before the Court on the tenth (10th) day after the service hereof, or as soon thereafter as counsel may be heard, for an Order pursuant to Rule 60(a) of the Federal Rules of Civil Procedure requesting correction of the Order of Default Judgment entered on January 20, 2011, against Defendants Global Advantage Distribution Warehouse, LLC d/b/a Global Advantage Distribution Warehouse, Inc., Global Advantage Distribution, Inc., Global Advantage Holding, LLC and Matthew J. Crawley.

Plaintiff respectfully submits the Court erroneously omitted pre-judgment interest from the calculation of actual damages sustained in connection with all causes of action asserted and overlooked evidence of damages relating specifically to the Unfair Trade Practices cause of action.

Plaintiff respectfully petitions this Court to issue an order adding an award for pre judgment interest and awarding damages pursuant to the Unfair Trade Practices cause of action pursuant to the laws of the State of South Carolina and the Federal Rules of Civil Procedure.

This Motion shall be supplemented by a memorandum of law.

Respectfully submitted,

ROGERS TOWNSEND & THOMAS, PC

/s/ Darra J. Coleman

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Attorneys for Plaintiff Pacific Capro Industries

d/b/a Capro Industries

March 29, 2011
Columbia, South Carolina

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CERTIFICATE OF SERVICE

I, Darra J. Coleman, an attorney with the Law Firm of Rogers, Townsend & Thomas, PC, certify that a copy of the foregoing documents has been served upon the below named individuals this 29th day of March, 2011, via U.S. Mail, postage prepaid and addressed as follows:

****Notice of Motion and Motion for Relief and Memorandum in Support of Motion to Relief***

Mr. Matthew J. Crawley
568 George Bishop Parkway
Myrtle Beach, South Carolina 29577

/s/ Darra J. Coleman